

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION SEVEN**

**CHALLENGE MANUFACTURING  
COMPANY, LLC,**

Respondent,

Case No. 07-CA-199352

and

**MICHAEL D. KILISZEWSKI,**

Individual Charging Party.

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**MOTION TO EXTEND PAGE LIMITS FOR BRIEF IN SUPPORT OF EXCEPTIONS**

Respondent Challenge Manufacturing Company moves for a page limit extension from 50 to 75 pages for its brief in support of its exceptions to the Decision of ALJ Paul Bogas. (By separate submission, Respondent also electronically filed a request for an extension of time from October 3, 2018 until **October 31, 2018** to file its exceptions and a brief in support of exceptions.) Challenge respectfully requests an expedited review of this motion and request.

In support of its request for extension of page limits, Challenge's counsel states the following:

1. The request is reasonable because the record in this case is substantial. The transcript of the hearing includes testimony from 12 different witnesses, contains over 35 exhibits, and is 521 pages long.
2. Respondent filed an 84-page post-hearing brief. The General Counsel filed a 32-page post-hearing brief. All post-hearing briefs were filed on August 2, 2018.
3. On September 5, 2018, ALJ Bogas issued a 22-page, single-spaced Decision.

4. This case involves multiple legal issues, theories, arguments, and defenses. The ALJ's proposed findings and conclusions also fail to address multiple material facts and arguments presented by Challenge. Challenge's exceptions, arguments, and defenses will provide bases for the Board to reject the ALJ's Decision for multiple reasons, and Challenge requests additional pages to brief all exceptions, issues, facts and arguments.

5. ALJ Bogas also made erroneous evidentiary rulings during the hearing that require extensive briefing for the Board to fully and fairly assess the merits of this case and the ALJ's proposed findings and conclusions.

6. Challenge's counsel contacted counsel for the General Counsel by email on September 26, 2018 to determine whether her client would concur in this request and with its separate request for an extension of time to file exceptions. Although counsel for the General Counsel stated that she "take[s] no position" to Challenge's requested 28-day extension to file exceptions, she objected to any extension in page limits.

WHEREFORE, Challenge respectfully requests it be allowed up to 75 pages for its brief in support of its exceptions.

MILLER JOHNSON  
Attorneys for Challenge Manufacturing

Dated: September 26, 2018

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**CERTIFICATE OF SERVICE**

The undersigned certifies on the 26<sup>th</sup> day of September, 2018, Respondent Challenge Manufacturing Company, LLC served a copy of its Motion to Extend Page Limits for Brief in Support of Exceptions upon the following individuals via email as follows:

Charging Party (pro se):

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MILLER JOHNSON  
Attorneys for Challenge Manufacturing

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